

**Submission to Transport Legislation (Disability Parking Permit Scheme) Amendment Bill 2019**

Committee Secretary  
Transport and Public Works Committee  
Parliament House  
George Street  
Brisbane Qld 4000

20 November 2019

Dear Committee Secretary, Transport and Public Works Committee,

Many sincere thanks for the opportunity to provide a submission regarding the Transport Legislation (Disability Parking Permit Scheme) Amendment Bill 2019. I am providing feedback as an individual, not as an official representative of any organisation.

I wholeheartedly support expanding the eligibility for a disability parking permit in Queensland to those persons with a total loss of vision, permanent severe visual impairment or a temporary visual impairment that must be of at least 6 months' duration, as certified by a doctor.

Approximately 250,000 Australians, including an estimated 47,000 Queensland residents, live with myalgic encephalomyelitis/chronic fatigue syndrome (ME/CFS).<sup>1</sup> Classified in 1969 by the World Health Organization as a neurological disease, ME/CFS is an extremely debilitating illness that affects multiple bodily systems.<sup>2</sup> 25% percent of patients are housebound/bedbound and therefore rely upon others for transport to medical appointments. Over 80% remain undiagnosed often due to insufficient medical training among doctors.<sup>3</sup> According to research by the National Centre for Neuroimmunology and Emerging Diseases, over 40% of ME/CFS patients had symptoms such as an

---

<sup>1</sup> *Myalgic Encephalomyelitis / Chronic Fatigue Syndrome Advisory Committee: Report to the NHMRC Chief Executive Officer*. Page v. <https://www.nhmrc.gov.au/about-us/publications/mecfs-advisory-committee-report-nhmrc-chief-executive-officer> 30 April 2019.

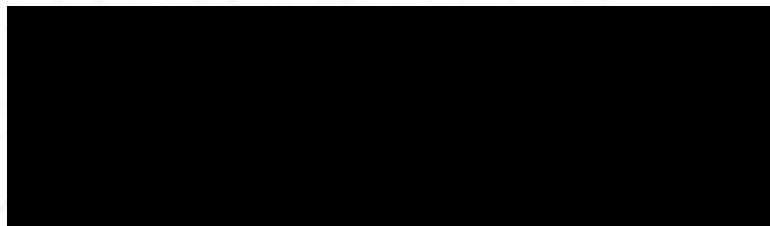
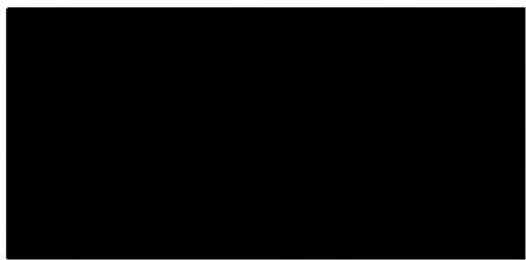
<sup>2</sup> *Myalgic encephalomyelitis: International Consensus Criteria* <https://onlinelibrary.wiley.com/doi/full/10.1111/j.1365-2796.2011.02428.x> Accessed 20 November 2019.

<sup>3</sup> *Myalgic Encephalomyelitis / Chronic Fatigue Syndrome Advisory Committee: Report to the NHMRC Chief Executive Officer*. Page 12.

inability to focus vision and poor depth perception.<sup>4</sup> If these symptoms become inadvertently diagnosed as a visual impairment rather than ME/CFS, I would hope that such patients would still be eligible for a disability parking permit.

ME/CFS-specific issues aside, I am appalled that the thousands of Queenslanders with vision impairment are currently ineligible for a disability parking permit. As outlined in the *Transport Legislation (Disability Parking Permit Scheme) Amendment Bill 2019: Explanatory Notes*, "New South Wales, the Australian Capital Territory, the Northern Territory and Tasmania already recognise the impact of blindness and vision impairment on mobility and allow for disabled parking permits to be issued to the blind and vision impaired members of their communities." In my opinion, unlike in those states and territories, excluding the many Queenslanders with vision impairment from access to a disability parking permit contravenes their rights under Australia's Disability Discrimination Act 1992.

I therefore urge the Queensland Parliament to approve the proposed amendments to the Transport Legislation (Disability Parking Permit Scheme) Amendment Bill 2019 to enable people with vision impairment to access the Disability Parking Permit Scheme.



---

<sup>4</sup> *Epidemiological characteristics of chronic fatigue syndrome/myalgic encephalomyelitis in Australian patients*. Page 104. <https://www.ncbi.nlm.nih.gov/pubmed/27279748> May 2016.